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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

RICHARD KADREY, *et al.*,  
  
Individual and Representative Plaintiffs,  
  
v.  
  
META PLATFORMS, INC., a Delaware  
corporation;  
  
Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF NIKKI K. VO IN  
SUPPORT OF ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL JOINT DISCOVERY  
LETTER BRIEF AND EXHIBITS**

I, Nikki K. Vo, hereby declare:

1. I am a Director and Associate General Counsel for Defendant, Meta Platforms, Inc. I have personal knowledge of the facts set forth in this declaration and, if called to testify as a witness, could and would testify competently thereto.

2. I make this declaration in support of Meta's administrative motion to file under seal the Joint Letter Brief on Meta's Motion for a Protective Order re: Plaintiff's Request to Depose Mark Zuckerberg ("Joint Letter Brief") and Exhibits E–N to the Joint Letter Brief. The motion seeks to have the following partially sealed or entirely sealed:

Document	Sealing Request
Joint Discovery Letter Brief	• Redacted portions
Exhibit E to Joint Discovery Letter Brief	• Entire document
Exhibit F to Joint Discovery Letter Brief	• Entire document
Exhibit G to Joint Discovery Letter Brief	• Entire document
Exhibit H to Joint Discovery Letter Brief	• Entire document
Exhibit I to Joint Discovery Letter Brief	• Entire document
Exhibit J to Joint Discovery Letter	• Entire document
Exhibit K to Joint Discovery Letter	• Entire document
Exhibit L to Joint Discovery Letter	• Entire document
Exhibit M to Joint Discovery Letter	• Entire document
Exhibit N to Joint Discovery Letter	• Entire document

3. Exhibit E is a highly sensitive confidential document detailing non-public information concerning budget requests for various generative AI initiatives within Meta. Public disclosure of this information exposes Meta to the risk of competitive harm.

4. Exhibit F is an excerpt of a highly sensitive confidential discussion of Meta's licensing strategy for Llama and its competitive positioning within the generative AI market. Public disclosure of this information exposes Meta to the risk of competitive harm.

